

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality West Central Regional Office**  
**FINAL STATEMENT OF LEGAL AND FACTUAL BASIS**

as amended September 14, 2004

Bassett Furniture Industries, Inc., Bassett Chair Plant

Bassett, Virginia

Permit No. VA-30287

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Columbia Gas Transmission Corp. has applied to renew the Title V Operating Permit for its Botetourt County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

*This permit is being amended in accordance with the mutual determination of permanent shut-down of equipment associated with the former J.D. Bassett Plant and boiler BL-1 and BL-3. This amended permit will supercede the original Title 5 Operating permit issued February 1, 2002 (effective date March 1, 2002) but will not affect the Expiration date of March 1, 2007.*

*Amendments to the Title 5 permit include the following:*

- *Delete any reference to J.D. Bassett*
- *Delete equipment associated with J.D. Bassett*
- *Delete boilers BL-1 and BL-3*
- *Update NSR references from permit dated July 30, 1999 to May 11, 2004*
- *Update NSR regulatory references from 9 VAC 5-80 10 et seq.*

Engineer/Permit Contact: \_\_\_\_\_ Date: \_\_\_\_\_

Air Permit Manager: \_\_\_\_\_ Date: \_\_\_\_\_

## **FACILITY INFORMATION**

### **APPLICANT:**

VA-30287 AIRS ID 51-089-0012  
Bassett Furniture Industries  
Bassett Chair  
P.O. Box 626  
Bassett, VA 24055

### **FACILITY LOCATION:**

85 Trent Hill Drive, Bassett  
UTM Coordinates are ZONE: 17 EASTING: 589.1 km NORTHING: 4069.5 km

### **FACILITY DESCRIPTION:**

Bassett Chair manufactures finished wood furniture and unfinished wood furniture parts covered by Standard Industrial Classification (SIC) Code 2511 [North American Industry Classification System (NAICS) Code 337122]. Operations at the facility can be conducted twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. Wood furniture and furniture parts are manufactured at the facility from rough-cut wood that is dried, milled, machined, sawed, and sanded. Furniture and parts are assembled, furniture is finished, and the furniture and parts are shipped.

*Currently, the Bassett Chair Plant is not in operation, though the company hopes business conditions will allow for production to recommence in the near future. The plant would need to install a new boiler to reopen.*

### Source Description

Portions of the facility are covered by a permit while other portions of the source have never been permitted. Currently permitted emissions units are woodworking dust collection systems C-WW4, C-WW5 and C-WW7 (permit dated 5/11/04). Non-permitted emissions units include wood drying kilns, woodworking dust collection systems, finishing lines, offline spray booths and dipping operations, and gluing operations.

Rough cut green hard wood is brought to the facility where it is dried in kilns. Primarily hardwoods are dried in the kilns. Furniture components are made from the dry wood by milling, machining, sawing, and sanding. All of the wood dust is collected by the facilities dust collection systems. Fabric filters control all emissions from the dust collection systems. The wood dust is used as fuel in the boilers and is stored in a silo. Three of the dust collection systems are covered by an NSR permit dated 5/11/04.

The furniture components that are assembled use various adhesives, such as hot melt and white

glue (similar to Elmer's), which contain little or no VOCs. Some of the VOC emissions from the gluing operations are emitted from spray booth stacks, while other emissions are fugitive in nature. The furniture assembly adhesive VOC emissions are not permitted.

The furniture is finished using finishing lines and/or off line spray booths and dipping tanks, which use solvent based finishes. The finishing lines consist of spray booths and drying ovens. Heat for the ovens is supplied by steam from the boilers. There are no controls for VOC emissions. Particulate emissions from the finishing lines and off line booths are uncontrolled.

### Compliance History

A review of DEQ inspection reports for the past 5 years (*from 2002, original issue date of Title 5 permit*) was conducted. Inspection reports indicate the source has been in compliance, with one exception. An NOV was issued in April 2000 for a failure to minimize emissions in accordance with 9 VAC 5-40-20 E. Bassett has paid a fine and installed filters on 2 spray booths (at the Superior Lines plant) as required by the SEP included in the resulting consent order. There have been several Requests for Corrective Action issued during this time frame for minor fugitive wood dust emissions. In each case, corrective action was taken by the source to correct the problems.

A permit was issued to the source on October 20, 1997 for the Bassett Chair Plant finishing line #1 (Ref. # C-FN1). This permit was for the installation of 6 electrostatic spray booths on the finishing line. This permit was rescinded by mutual agreement on August 9, 2001.

On July 30, 1999 the source received a permit for 6 woodworking dust collection systems to remove reference to specific woodworking equipment. This permit superseded permits dated December 27, 1988, February 3, 1989, and February 26, 1990 for the Bassett Chair Plant and October 20, 1988, October 8, 1991, and April 7, 1994 for the J. D. Bassett Plants. *The July 30, 1999 permit has been superceded by permit dated May 11, 2004.*

### **EMISSIONS SUMMARY:**

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]	
CRITERIA POLLUTANTS	1999 ESTIMATED EMISSIONS
Particulate Matter (PM <sub>10</sub> )	17.1
Nitrogen Oxides (NO <sub>x</sub> )	14.6
Sulfur Dioxide (SO <sub>2</sub> )	1.8
Carbon Monoxide (CO)	129.1
Volatile Organic Compounds (VOC)	869.5
HAZARDOUS AIR POLLUTANTS	
Combined HAPs	Greater than 25

## **TITLE V PROGRAM APPLICABILITY BASIS:**

This facility has the potential to emit greater than 100 tons per year of VOCs and greater than 25 tons per year of HAPs. Due to this facility's potential to emit Bassett Chair is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 9 VAC 5 Chapter 80 Article 1.

### **Applicable Requirements**

#### Emissions Standards and Visible Emission Requirements

##### Woodworking (C-WW)

All wood dust systems at the facility are controlled by fabric filters or closed looped systems controlled by a fabric filter. Three of the wood dust systems are permitted (C-WW4, C-WW5, C-WW7 permitted 5/11/04). Emission limits for the source's NSR permit are for PM-10 emissions. PM-10 is a regulated pollutant. The NSR permit requires that particulate emissions from the permitted dust collection systems be controlled by fabric filters. Several cyclones are used by the source as precleaners, but all are either in closed loops or discharge to a fabric filter. PM-10 limits for the permitted dust systems are based a particulate load of 0.01 gr/dscf and limited hours of operation. The particulate loading of 0.01 gr/dscf is easily attained when controlled by fabric filters that are operated properly and are below their capacity<sup>1</sup>. The unpermitted dust systems must meet the particulate loading standard of 0.05 gr/dscf, as required by 9 VAC 5-40-2270. Again, this is easily attained when controlled by a fabric filter. With the throughput restrictions, required controls, required recordkeeping, required maintenance inspections, and conservative emissions limits it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits and regulated standard.

Visible emissions from the fabric filter exhausts of the six permitted dust systems are limited to 5% opacity. Visible emissions from the non-permitted dust system fabric filter exhausts are limited to 20% opacity by 9 VAC 5-40-80. Under normal operations there are no visible emissions from the fabric filter exhausts. Any visible emissions would be because of a malfunction or poor operations and maintenance. Included in this permit are the requirements that the source develop maintenance, inspection, spare parts, and training programs to insure the proper operation of the fabric filters. Inspections of the fabric filters shall be monthly at a minimum. Monitoring of opacity, required by the Consent Decree dated 10/15/99, will require the source to at least one time per week observe for the presence of visible emissions from the fabric filters, log the observations, and take corrective action if necessary to minimize emissions. With the low potential emissions, it is felt that these maintenance and operation procedures will assure compliance with the opacity standard.

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<sup>1</sup> When operating properly at 99.9% control efficiency emissions should be approximately 0.005 gr/dscf.

### Finishing Room (C-FN1, C-FN2)

Finishing at the facility takes place on finishing operation #1 (C-FN1) and #2 (C-FN2). These finishing operations each consist of a finishing line as well as off-line spray booths and tanks for dipping and wash-off. None of the finishing operations are covered by an NSR permit. Emissions from the finishing spray booths are PM and VOCs. None of the spray booths have particulate filters. There are fugitive VOC emissions from the dipping and wash off tanks.

Visible emissions from all spray booths are limited to 20% opacity, by 9 VAC 5-40-80. In order to assure compliance the Title V permit requires the source to develop maintenance and training programs to insure the proper operation of the spray booths. To monitor opacity, as required by the Consent Decree dated 10/15/99, this permit will have the source, at least weekly, observe for any visible emissions, log the observation, and take corrective action if necessary to minimize emissions. It is felt that the monitoring will assure compliance with the opacity standard.

### MACT requirements

Because this source has the potential to emit greater than 10 tons/yr of any single HAP and/or 25 tons/yr of any combination of HAPs it is subject to the MACT for furniture finishing. The source emitted greater than 50 tons of HAPs in 1996, therefore, its compliance date for the MACT was November 21, 1997. The source intends to use compliant coatings to meet the emission standards required by the MACT, however, the averaging method of compliance is still available to the source should it be needed. As the source does not intend to use a control device to meet the emission standards, those portions of the MACT requirements dealing with control devices have not been included in this Title V permit. The source has submitted its initial compliance certification and to date has submitted its required continuous certifications.

### Insignificant Activities

The insignificant activities for this facility consist of storage tanks for a variety of lacquers, thinners and other finishing materials and are categorized under 9 VAC 5-80-720 B (Emission Units with Insignificant emissions levels). The gluing operations utilize mostly water-based glues and are also considered to be an insignificant source of VOC and HAP emissions. Bassett Furniture Industries would have to report significant HAP emissions from gluing for MACT compliance if this were not the case. The dry kilns are existing equipment and are not covered by a NSR permit. The source dries primarily hard woods and is therefore considered to be an insignificant source of VOC emissions as demonstrated below:

$$\frac{42,180,000 \text{ bd-ft hard wood}}{\text{yr.}} \times \frac{0.211 \text{ lb.VOC}}{1000 \text{ bd-ft}} = \frac{4.5 \text{ tons VOC}}{\text{yr.}}$$

*Note that since both boilers are shut down, there will be no kiln activity until another boiler(s) are permitted for use.*

### Generally Applicable Requirements

Visible emissions from any emissions unit not specifically listed can not exceed 20% opacity. This is in accordance with 9 VAC 5-40-80.

### Inapplicable Requirements

The startup, shut down and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

### State-only Requirements

None

### **Compliance Plan**

Source is not subject to a compliance plan but is subject to the terms of a Consent Decree with the USEPA dated October 15, 1999.

### **LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the Commonwealth of Virginia Federal Operating Permit Regulations for the purposes of Title V of the Federal Clean Air Act (9 VAC 5 Chapter 80 Article 1), and underlying applicable requirements in other state and federal rules. Applicable requirement means all of the following as they apply to emission units in a Title V source:

- a. Any standard or other requirement provided for in the State Implementation Plan or the Federal Implementation Plan, including any source-specific provisions such as consent agreements or orders.
- b. Any term or condition of any preconstruction permit issued pursuant to 9 VAC 5-80-1100, et seq., Article 8 (9 VAC 5-80-1700 et seq.) of this part or of any operating permit

issued pursuant to 9 VAC 5 Chapter 80 Article 5, except for terms or conditions derived from applicable state requirements or from any requirement of these regulations not included in the definition of applicable requirement.

- c. Any standard or other requirement prescribed under these regulations, particularly the provisions of 9 VAC 5 Chapter 40 (9 VAC 5-40-10 et seq.), 9 VAC 5 Chapter 50 (9 VAC 5-50-10 et seq.) or 9 VAC 5 Chapter 60 (9 VAC 5-60-10 et seq.), adopted pursuant to requirements of the federal Clean Air Act or under §111, 112 or 129 of the federal Clean Air Act.
- d. Any requirement concerning accident prevention under §112(r)(7) of the federal Clean Air Act.
- e. Any compliance monitoring requirements established pursuant to either §504(b) or §114(a)(3) of the federal Clean Air Act or these regulations.
- f. Any standard or other requirement for consumer and commercial products under §183(e) of the federal Clean Air Act.
- g. Any standard or other requirement for tank vessels under §183(f) of the federal Clean Air Act.
- h. Any standard or other requirement in 40 CFR Part 55 to control air pollution from outer continental shelf sources.
- i. Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the federal Clean Air Act, unless the administrator has determined that such requirements need not be contained in a permit issued under this article.
- j. With regard to temporary sources subject to 9 VAC 5-80-130, (i) any ambient air quality standard, except applicable state requirements, and (ii) requirements regarding increments or visibility as provided in Article 8 (9 VAC 5-80-1700 et seq.) of this part.
- k. Any standard or other requirement of the acid deposition control program under Title IV of the Clean Air Act or the regulations promulgated thereunder.
- l. Any standard or other requirement governing solid waste incineration under §129 of the Clean Air Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 9 VAC 5 Chapter 80 Article 1 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that

is enforceable by the state but is not federally-enforceable is identified in the draft Title V permit as such.

This facility has been found to be subject to the requirements set forth in items Aa, b, and c@ above.

**REQUEST FOR VARIANCES OR ALTERNATIVES:**

None

**COMMENT PERIOD:**

The public notice appeared in the Martinsville BULLETIN on October 14, 2001.

Beginning Date: October 14, 2001

Ending Date: November 13, 2001

All written comments should be addressed to the following individual and office:

Lillian Alexander  
Environmental Engineer  
Department of Environmental Quality  
West Central Regional Office  
3019 Peters Creek Road  
Roanoke, VA 24019  
Phone: 540/562-6783 Fax: 540/562-6729

*No public comment period is required for a minor permit amendment, however, EPA will be allowed 45 days to review and comment on this draft. The 45-day period will commence on July 31, 2004 and end on September 13, 2004.*

**PROCEDURE FOR REQUESTING PUBLIC HEARING:**

During the public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for a public hearing shall be in writing to the above address and shall state the nature of the issues proposed to be raised in the hearing. The Director shall grant such a request for a hearing if he concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.